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8 **UNITED STATES DISTRICT COURT**
9
10 **DISTRICT OF NEVADA**

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12 PAMELA DITTMAR,

13 Plaintiff,

14 v.

15 CITY OF NORTH LAS VEGAS, a municipal
16 corporation,

17 Defendant.

Case No. 2:17-cv-02916-JAD-BNW

**STIPULATION TO EXTEND
DISPOSITIVE MOTION RESPONSE
AND REPLY DEADLINES FOR ONE
JUDICIAL DAY**

(Sixth Request)

ECF No. 100

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19 NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie A.
20 Hill and Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its
21 attorneys, R. Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that
22 the deadlines to file responses to the currently pending dispositive motions be extended one
23 additional judicial day from the current deadline of June 25, 2021 up to and including June 28, 2021
24 and the deadline to file replies be extended from the current deadline of July 16, 2021 up to and
25 including July 19, 2021.

26 This is the sixth request for an extension of the dispositive motion deadline. The first request
27 was by stipulation to extend the dispositive motion deadline thirty (30) days from the extended
28 discovery cutoff deadline to complete the remaining two depositions. The second request was by

1 motion due to Plaintiff's counsel's ongoing illness with Covid-19 symptoms. The third request was
2 due to Plaintiff's counsel's immediate family member's emergency hospitalization for nearly one
3 week. The fourth request was due to Plaintiff's counsel's significant injuries from two separate
4 accidents. The fifth request was due to Plaintiff's counsel's significant injuries from two separate
5 accidents to allow her to have additional diagnostic tests, pain management, and give her additional
6 time from her original estimate on a requested extension to treat and heal. This Stipulation is made
7 at the request of Plaintiff's counsel for the reasons set forth herein and this is the sixth stipulation for
8 an extension of the response and reply deadlines.

9 In support of this Stipulation and Order, the parties state as follows:

10 1. The current deadline to file responses to the currently pending dispositive motions is
11 June 25, 2021. When the parties first entered into a stipulation to extend the dispositive motion
12 deadline, it was to extend the dispositive motion deadline to thirty (30) days from the extended
13 discovery cutoff deadline to complete the remaining two depositions. When the parties next
14 entered into a stipulation to extend the dispositive motion deadline, it was to extend the dispositive
15 motion deadline thirty (30) days due to Plaintiff's counsel's ongoing illness with Covid-19
16 symptoms. The parties then entered into a stipulation for an additional seven (7) days due to
17 Plaintiff's counsel's family member's health emergency. The parties then stipulated to extend the
18 dispositive motion deadline due to Plaintiff's counsel's significant injuries from two separate
19 accidents to allow Plaintiff's counsel to have additional diagnostic tests, pain management, and
20 additional time from her original estimate on a requested extension to treat and heal.

21 2. Counsel for Plaintiff reached out to counsel for Defendant today to inform them that
22 she needs additional assistance with her exhibits and her paralegal had a medical procedure today
23 and cannot assist her today due to that procedure and drugs taken so she is requesting an additional
24 one judicial day extension to file her response and exhibits in support of her motion for summary
25 judgment on Monday, June 28, 2021. Due to Plaintiff's pain and accident, she is also not able to sit
26 and work for long periods of time and the exhibit preparation, in addition to the response preparation
27 is very time consuming and therefore Counsel for Plaintiff needs additional time and assistance to
28 complete the response and exhibits necessitating this stipulation to extend the response and reply

1 deadlines one judicial day.

2 3. Defendant is sympathetic to Plaintiff's counsel's immediate health concerns and
3 recognizes the difficulties with the same. In that regard, Defendant has entered this stipulation so
4 long as it is not prejudiced in preparing and filing its briefs so the parties have also agreed to extend
5 the response and reply deadlines for both parties one judicial day.

6 4. The parties have agreed to extend the deadline to file responses to the dispositive
7 motions until June 28, 2021. The parties have further agreed that replies will be due on July 19,
8 2021. No other deadlines are being extended by this stipulation, such as the deadline for discovery
9 and to file a motion to compel written discovery.

10 5. This stipulation to extend this dispositive motion deadline is brought in good faith,
11 with a showing of good cause, and is not sought for any improper purpose or other purpose of
12 delay, but to allow counsel for the Plaintiff additional time and assistance from her paralegal, who
13 is unavailable today due to a medical procedure, to finalize and file her response in opposition and
14 exhibits. This extension will allow counsel for Plaintiff the additional time necessary to do so prior
15 to filing her response.

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1 WHEREFORE, the parties respectfully request by this stipulation that the Court extend
2 the deadline to file responses to the pending dispositive motions from the current deadline of June
3 25, 2021 up to and including June 28, 2021. The parties further request that the Court extend the
4 deadline to file replies to the dispositive motions from the current deadline of July 16, 2021 up to
5 and including July 19, 2021.

6 DATED this 25th day of June, 2021.

7 MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

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16 IT IS SO ORDERED:

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18 JENNIFER A. DORSEY
19 UNITED STATES DISTRICT JUDGE

20 Dated: 6-25-2021